

VERIZON RESPONSE TO NJ BPU KPMG EXCEPTION

Exception #:	20
Component:	Verizon – New Jersey’s (Verizon-NJ) metrics change notification process is deficient.
Domain:	Metric
Date Uncovered by KPMG:	2/8/01
Date VERIZON Received:	2/8/01
Date VERIZON Responded:	2/20/01; 3/15/01 (1 st Revision); 5/09/01 (2 nd Revision)
Date KPMG Consulting Responded:	3/09/01; 4/30/01 (1 st Revision)
KPMG Summary Statement	Findings from this test indicate that Verizon is not consistently providing the CLECs and the NJ BPU with all necessary metric change information. Without an adequate and complete metrics change notification process, the NJ BPU and CLECs will not have the information needed to accurately monitor Verizon’s performance and ensure proper calculation of metrics values.
Verizon Response:	Verizon’s 5/09/01 Reply to KPMG Consulting’s 4/30/01 Response.
KPMG Consulting Response:	<p>KPMG Consulting’s 4/30/01 Reply to Verizon’s 3/15/01 Response</p> <p>As part of the PMR 5 test, KPMG Consulting has continued to monitor Verizon- NJ’s Issues Logs for the month of January 2001 and February 2001. The Issue Logs did not list information on all metrics changes encountered by KPMG Consulting.</p> <p>In addition to the changes that KPMG Consulting was unable to locate in the December Issue Log, listed below are specific examples of changes not found in the January 2001 and February 2001 Issue Logs:</p>

#1

Change Number:
CCNJ2000-00125-ORD

Domain:
Ordering

Metric Family:
OR-4-09, OR-4-10, OR-4-11, OR-7-01

Product Group:
UNE/Resale LSR

First Metric Reporting Month:
December 2000

Description of Change:
This CCR was issued to include orders where the confirmation or reject is sent by VZ's NetLINK System as dictated by the NJ Carrier to Carrier Guidelines. Previously the exclusion was based on order origin.

Change not found in:
January 2001 Issue Log
February 2001 Issue Log (all metrics affected by this change not reflected in the Issue Log)

VERIZON RESPONSE

CCNJ2000-00125-Ord applied only to OR-7-01. It was reported on the January Issues Log, dated 2/23/01 on the CLOSED TAB. It did not apply to OR 4-09, OR 4-10 or OR 4-11.

#2

Change Number:
CCNJ 2001-00366-Pro

Domain:
Maintenance and Repair & Provisioning

Metric Family:
MR-2-05 and PR-6-03

Product Group:
Specials

First Metric Reporting Month:
February 2001

Description of Change:
This CCR was issued to add in NTF (No trouble found) as a trouble code to calculate these metrics. Prior to this Change Control, the trouble codes used were FOK (Found OK), TOK (Test OK) and CPE (Customer Premises Equipment). Now, all four trouble codes will be used in calculation.

Change not found in:
January 2001 Issue Log
February 2001 Issue Log

VERIZON RESPONSE

Both MR 2-05 and PR 6-03 were on January Issue Log, dated 2/23/01, on the Newly Identified TAB. On the February Log, MR 2-05 was on the Open TAB and PR 6-03 was on the CLOSED TAB.

#3

Change Number:
CCNJ 2001-00682-Pro

Domain:
Provisioning

Metric Family:
PR1,2,3

Product Group:
All

First Metric Reporting Month:
February 2001

Description of Change:
This CCR was issued to exclude special project orders received from 11/29/00 to 1/30/01 with an AECN equal to EXU. Prior to this Change Control all orders within these dates had been excluded.

**Change not found in:
January 2001 Issue Log
February 2001 Issue Log**

VERIZON RESPONSE

This issue was not discovered until the end of March. The Change Control Correction was approved on 4/6/01. This change was effective for the March data month. This was correctly reported on the March Log, dated 4/23/01, on the New Issues TAB. It would not appear on either the January or February Issues Log since the issue was unknown.

#4

Change Number:
CCNJ 2000-00143-Pro

Domain:
Provisioning

Metric Family:
PR 1-01,2,7,8,9,10,11
2-01,2,3,7,8,9,10,11
4-01,2,3,8,9, & 5-01,2,3,
6-01,3 & 7-01 & 8-01,2

Product Group:
UNE DS1/DS3

First Metric Reporting Month:
February 2001

Description of Change:
This CCR was issued to report DS1 and DS3 ASR UNE order product performance results in ED (Evidentiary Database) instead of in SORD as was previously being done.

Change not found in:
January 2001 Issue Log
February 2001 Issue Log

VERIZON RESPONSE

This Change Control was issued to change the source of this data. This was reported on the March Issues Log dated 4/23/01, on the New Issues TAB.

#5

Change Number:
CCNJ2000-00336-Pro

Domain:
Provisioning

Metric Family:
PR 1-09, 2-09, 4-01, 4-02
4-03, 4-09, 7-01, 8-01, 8-02

Product Group:
UNE

First Metric Reporting Month:
February 2001

Description of Change:
This CCR was issued to accurately identify the DSO M loops and EEL loops billed in the CRIS system.

Change not found in:
January 2001 Issue Log
February 2001 Issue Log

VERIZON RESPONSE

This was reported on the March Issues Log dated 4/23/01 on the New Issues Tab.

#6

Change Number:
CCNJ2000-00499-Pro

Domain:
Provisioning

Metric Family:
PR 1-01,2,7,8,9,10,11
2-01,2,3,7,8,9,10,11
4-01,2,3,8,9, & 5-01,2,3,
6-01,3 & 7-01 & 8-01,2

Product Group:
UNE

First Metric Reporting Month:
February 2001

Description of Change:
This CCR was issued in order to inform Provisioning data providers that DS1/DS3 data is no longer required from SORD system.

**Change not found in:
January 2001 Issue Log
February 2001 Issue Log**

VERIZON RESPONSE

This Change Control Request was issued for information purposes only to internal Verizon Data Providers. This was to inform the Data Providers that the data was to be provided from the Evidentiary Database with no impact on the data reported. Since this CCR was not a data correction it was appropriately excluded from the Metrics Issues Log.

#7

Change Number:
CCNJ 2001-00511-Ord

Domain:
Ordering

Metric Family:
OR-1, OR-2, OR-3, OR-4, OR-5, OR-6

Product Group:
UNE/Resale LSR

First Metric Reporting Month:
February 2001

Description of Change:
This CCR was issued to exclude additional CLEC Test ID's from the aggregate metrics calculations. Prior to this Change Control the CLEC Test ID's were included in the metrics calculations.

**Change not found in:
January 2001 Issue Log
February 2001 Issue Log**

VERIZON RESPONSE

This change control was to ensure uniform exclusion of all Test CLEC ID's. Prior to this change control Test CLEC ID's were excluded but Verizon had identified inconsistencies between Data Providers. The Change Control was approved on 2/27/01 and appropriately not included on the January or February Issues Log.

#8

Change Number:
CCNJ2001-00503-Ord

Domain:
Ordering

Metric Family:
OR-7-01

Product Group:
UNE/Resale LSR

First Metric Reporting Month:
January 2001

Description of Change:

This CCR was issued to exclude LSR's that are cancelled prior to a confirmation or rejection and exclude LSR's that are supplemented prior to a confirmation or rejection as dictated by the NJ Carrier to Carrier Guidelines. These orders were previously included in the metric calculation.

**Change not found in:
January 2001 Issue Log
February 2001 Issue Log**

VERIZON RESPONSE

Change Control 2001-00503 was approved on 2/27. The description cited by KPMG for this change is incorrect. The correct description is: OMD was reporting results in minutes and ED was reporting results in hours and minutes for these metrics. The metric results are a combination of LSR (OMD) and ASR (ED) data. Since the Change Control was approved on 2/27/01 it would not be included on the January or February report.

#9

Change Number:
CCNJ2000-00083-ORD

Domain:
Ordering

Metric Family:
OR-4-01, OR-4-02

Product Group:
UNE/Resale LSR

First Metric Reporting Month:
December 2000

Description of Change:

This CCR was issued to include UNE Hot Cut loop orders to the metrics. Between Aug00 and Nov00, UNE Hot Cut loop orders (service type equal to "04" and "05") were excluded from the metric calculation.

**Change not found in:
January 2001 Issue Log
February 2001 Issue Log**

VERIZON RESPONSE

CC2000-00083-Ord does not apply to New Jersey. It was issued to implement a NY Consensus item in NY and the New England states, therefore it would not be reported on the NJ Issues Log.

Verizon's 3/15/01 response to KPMG Consulting's 03/09/01 Clarification Request.

Table 1: Metrics changes not found in Issue Logs

Number

Issue Log Delivery Date

Change not Found

Verizon Response

KPMG Clarification

Verizon Response:

1

December 26, 2000

CC2000115

Verizon disagrees with KPMG. CC2000115 does appear on the issues log. KPMG is unable to locate this change in the Issue Log. KPMG requests that Verizon identify exactly where in the log this change is located

[December 26, 2000 - Issues Log, Open - TAB, Row 4](#)

[December 26, 2000 -Issues Log, Closed – TAB, Row 19](#)

2

December 26, 2000

CC2000101

Verizon agrees with KPMG due to an over site this change control was not listed on the issues log.

No clarification needed

3

December 26, 2000

CC2000105

Verizon disagrees with KPMG. CC2000105 does appear on the issues log. KPMG is unable to locate this change in the Issue Log. KPMG requests that Verizon identify exactly where in the log this change is located

[December 26, 2000 -Issues Log, Closed – TAB, Row 40](#)

4

December 26, 2000

CC200062

Verizon disagrees with KPMG. CC200062 was completed 5/10/00 for NY, therefore should not be on the NJ issues log.

CC200062 was implemented for August 2000 in NJ. KPMG is unable to replicate the C2C values for August forward without implementing the change.

[December 26, 2000 –Issues Log, CC200062 was not implemented for NJ. Clarifying questions with KPMG indicate the issue involves OR 4-01 and OR 4-02. Verizon implemented the New Jersey Guidelines under CC200084. Due to a misinterpretation of the NJ Guidelines, Hot Cuts were removed from the counts for the OR 4-01 and OR 4-02 metrics. Change Request 2000-00181-ORD, which was identified for the Northern States, was implemented for the December 2000 data month. This change](#)

was also implemented, in error, for NJ. A Data Calculation Change Control to document the work completed for the New Jersey will be issued.

5

December 26, 2000

CC200024

Verizon disagrees with KPMG. CC200024 was completed 4/11/00 for NY, therefore should not be on the NJ issues log.

KPMG Consulting concurs with Verizon's response.

6

December 26, 2000

CC2000158 (all metrics affected by this change not reflected in Issue Log)

Verizon disagrees with KPMG. All affected metrics are listed on the issues log.

KPMG is unable to locate all the affected metrics in the Issue Log. KPMG requests that Verizon identify exactly where in the log all the changes are located

[December 26, 2000 -Issues Log, NEW – TAB, Row 23](#)

7

December 26, 2000

CC**2000-00005-PRO (all metrics affected by this change not reflected in Issue Log)

Verizon disagrees with KPMG. All affected metrics are listed on the issues log.

KPMG is unable to locate all the affected metrics in the Issue Log. KPMG requests that Verizon identify exactly where in the log all the changes are located

[December 26, 2000 -Issues Log, Closed – TAB, Row 53 & 54](#)

**KPMG Consulting
Response:**

**KPMG Consulting's 03/09/01 Clarification Request of Verizon's 02/20/01
Response**

(See table below)

Table 1: Metrics changes not found in Issue Logs

Number

Issue Log Delivery Date

Change not Found

Verizon Response

KPMG Clarification

1

December 26, 2000

CC2000115

Verizon disagrees with KPMG. CC2000115 does appear on the issues log.

KPMG is unable to locate this change in the Issue Log. KPMG requests that Verizon identify exactly where in the log this change is located

2

December 26, 2000

CC2000101

Verizon agrees with KPMG due to an over site this change control was not listed on the issues log.

No clarification needed

3

December 26, 2000

CC2000105

Verizon disagrees with KPMG. CC2000105 does appear on the issues log.

KPMG is unable to locate this change in the Issue Log. KPMG requests that Verizon identify exactly where in the log this change is located

4

December 26, 2000

CC200062

Verizon disagrees with KPMG. CC200062 was completed 5/10/00 for NY, therefore should not be on the NJ issues log.

CC200062 was implemented for August 2000 in NJ. KPMG is unable to replicate the C2C values for August forward without implementing the change.

5

December 26, 2000

CC200024

Verizon disagrees with KPMG. CC200024 was completed 4/11/00 for NY, therefore should not be on the NJ issues log.

KPMG Consulting concurs with Verizon's response.

6

December 26, 2000

CC2000158 (all metrics affected by this change not reflected in Issue Log)

Verizon disagrees with KPMG. All affected metrics are listed on the issues log.

KPMG is unable to locate all the affected metrics in the Issue Log. KPMG requests that Verizon identify exactly where in the log all the changes are located

7

December 26, 2000

CC**2000-00005-PRO (all metrics affected by this change not reflected in Issue Log)

Verizon disagrees with KPMG. All affected metrics are listed on the issues log.

KPMG is unable to locate all the affected metrics in the Issue Log. KPMG requests that Verizon identify exactly where in the log all the changes are located

VERIZON Response: Verizon's 2/20/01 Response to Exception

Response to Table 1: Metrics changes not found by KPMG in Issue Logs

Number	Issue Log Delivery Date	Change not Found	Verizon Response
1	December 26, 2000	CC2000115	Verizon disagrees with KPMG. CC2000115 does appear on the issues log.
2	December 26, 2000	CC2000101	Verizon agrees with KPMG due to an over site this change control was not listed on the issues log.
3	December 26, 2000	CC2000105	Verizon disagrees with KPMG. CC2000105 does appear on the issues log.
4	December 26, 2000	CC200062	Verizon disagrees with KPMG. CC200062 was completed 5/10/00 for NY, therefore should not be on the NJ issues log.
5	December 26, 2000	CC200024	Verizon disagrees with KPMG. CC200024 was completed 4/11/00 for NY, therefore should not be on the NJ issues log.
6	December 26, 2000	CC2000158 (all metrics affected by this change not reflected in Issue Log)	Verizon disagrees with KPMG. All affected metrics are listed on the issues log.
7	December 26, 2000	CC**2000-00005-PRO (all metrics affected by this change not reflected in Issue Log)	Verizon disagrees with KPMG. All affected metrics are listed on the issues log.

Verizon also disagrees that the Issues Log has not been sent consistently. Verizon did file an Issues Log for the December C2C report. It was sent to the to the BPU and CLECs as required. A copy was not forwarded to KPMG. The Issues Log will be provided to KPMG on 2/14/01.

Response to Table 2: Metrics changes with insufficient detail

Verizon will give full consideration to KPMG's comment that some of the descriptions of the Issues Log may not have had enough detail when preparing future Logs. Verizon is available to discuss more fully any issue listed on the Logs for which a CLEC or the BPU requires more detail.